

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

DAVID CORREIA,

Defendant.

No. 19 Cr. 725 (JPO)

ORAL ARGUMENT REQUESTED

**DEFENDANT DAVID CORREIA'S NOTICE OF MOTION TO FILE
A SEALED, EX PARTE DECLARATION**

PLEASE TAKE NOTICE that, upon this Notice of Motion to File a sealed, *ex parte* Declaration, defendant David Correia hereby moves this Court before the Honorable J. Paul Oetken at the United States District Courthouse, 40 Foley Square, New York, New York 10007, at such a date and time as the Court may direct, for an Order granting Mr. Correia's motion to file under seal and *ex parte* his attorney Jeff Marcus's declaration in support of his separately filed Privilege Motion. *See In re Grand Jury Subpoenas dated Mar. 19 and Aug. 2, 2002*, M 11–189 (DC), 2002 WL 31040322, at *1 (S.D.N.Y. Sept. 12, 2002) (permitting sealed, *ex parte* submission by defense counsel where the submission reveals privileged information).

Dated: April 3, 2020
New York, NY

Respectfully submitted,

By: /s/ William J. Harrington
William J. Harrington, Esq.
Goodwin Procter, LLP
The New York Times Building
620 Eighth Avenue
New York, New York 10018
wharrington@goodwinlaw.com
Telephone: (212) 813-8800
Facsimile: (212) 355-3333

Attorney for Defendant David Correia

Jeff Marcus, Esq.
One Biscayne Tower
2 South Biscayne Blvd,
Suite 1750
Miami, Florida 33131
jmarcus@mnrlawfirm.com
Telephone : (305) 400-4260
Admitted Pro Hac Vice

Attorney for Defendant David Correia

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2020, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/ William J. Harrington
William J. Harrington